

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division

DONNA K. SOUTTER,  
For herself and on behalf of all similarly  
situated individuals,

Plaintiff,

v.

CIVIL ACTION NO. 3:10-cv-00107

EQUIFAX INFORMATION SERVICES LLC,

Defendant.

DECLARATION OF JOHN ANTHONY LOVE IN SUPPORT OF  
DEFENDANT EQUIFAX INFORMATION SERVICES LLC'S  
MOTION TO FILE DOCUMENTS UNDER SEAL

I, John Anthony Love, declare as follows:

1. I am one of the attorneys representing Defendant Equifax Information Services LLC ("Equifax") in this case. I have personal knowledge of the facts below and am otherwise competent to provide this declaration.
2. Equifax produced a number of e-mails to plaintiff in discovery in this case.
3. Many of the e-mails were designated "Confidential" under the Stipulated Protective Order entered by the Court.
4. Plaintiff notified Equifax that she intended to file - in an unsealed manner - some of these e-mails in support of her opposition to the motion to consolidate that has been filed in the case.
5. Plaintiff has not, despite requests, identified the specific bates numbered e-mails that she intends to file with the Court.

6. An e-mail exchange reflecting this request is attached as Exhibit A-1 to Equifax's Motion to Seal.

Pursuant to 28 U.S.C. § 1746, I declare under the penalty of perjury under the laws of the Commonwealth of Virginia and the United States of America that the foregoing is true and correct.

Executed this 23 day of September, 2010 in Atlanta, Georgia.

  
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JOHN ANTHONY LOVE